

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO,  
et al.,

*Plaintiffs,*

v.

THE STATE OF TEXAS, et al.,

*Defendants.*

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Consolidated Case No. 5:21-CV-0844-XR

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***LUPE, OCA-GREATER HOUSTON, HAUL, LULAC, AND MI FAMILIA VOTA*  
PLAINTIFFS' SECOND SUPPLEMENTAL RULE 26(a)(1) INITIAL DISCLOSURES**

Pursuant to Federal Rule of Procedure 26(a)(1), and the Court's November 18, 2021, Order, ECF NO. 125, the *LUPE, OCA-Greater Houston, HAUL, LULAC*, and *Mi Familia Vota* Plaintiffs ("Plaintiffs") make the following supplemental disclosures:

**I. Supplemental Initial Disclosure Qualifications**

These supplemental disclosures are made upon information presently known to Plaintiffs and without prejudice to Plaintiffs' right to produce during discovery or at trial such data, information or documents as are: (a) subsequently discovered; (b) subsequently determined to be relevant for any purpose; or (c) subsequently determined to have been omitted from this and any supplemental disclosure statements. By making these disclosures, Plaintiffs do not represent that they are identifying every document, tangible thing, or witness that may be relevant to the issues in this lawsuit, or on which Plaintiffs may rely in support of their claims or defenses. Nor do Plaintiffs waive their rights to object to the disclosure of any person, document, or thing on the basis of any applicable privilege, the work product doctrine, relevancy, competency, materiality, undue burden, hearsay, or any other valid objection in response to any discovery request or

proceeding in this case. Further, Plaintiffs reserve all rights to present at trial or other hearing in this matter additional witnesses and evidence not presently identified or encompassed by these disclosures, and to present any rebuttal or impeachment evidence they deem appropriate.

## **II. Supplemental Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)**

### **A. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment (Fed. R. Civ. P. 26(a)(1)(A)(i))**

In addition to the persons identified in Plaintiffs' previous disclosures, the following individuals are likely to have discoverable information that Plaintiffs may use to support their claims and/or defenses, not including information to be used solely for impeachment.

#### **1. Madeleine Appel, on behalf of Plaintiff League of Women Voters of Texas.**

Ms. Appel may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073. Ms. Appel is a member of the League of Women Voters of Texas and will likely have discoverable information regarding the impact of SB 1 on voters who seek to cast absentee ballots by mail.

#### **2. Janet Eickmeyer, on behalf of Plaintiff League of Women Voters of Texas.**

Ms. Eickmeyer may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073. Ms. Eickmeyer is a member of the League of Women Voters of Texas and will likely have discoverable information regarding the impact of SB 1 on voters who seek to cast absentee ballots by mail.

#### **3. Jeannie Lewis, on behalf of Plaintiff League of Women Voters of Texas.**

Ms. Lewis may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073. Ms. Lewis is a member of the League of Women Voters

of Texas and will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who seek to cast absentee ballots by mail.

**4. Marian Alexander, on behalf of the OCA-GH Plaintiffs.**

Ms. Alexander may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073. Ms. Alexander will likely have discoverable information regarding the impact of SB 1 on voters who seek to cast absentee ballots by mail.

**5. Judy Alter, on behalf of the OCA-GH Plaintiffs.**

Ms. Alter may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073. Ms. Alter will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who seek to cast absentee ballots by mail.

**6. Toby Cole, on behalf of the OCA-GH Plaintiffs and The Arc of Texas.**

Mr. Cole may be contacted at 1616 S. Voss Road Suite 450, Houston, TX 77057, (713) 805-3522. Mr. Cole will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who seek to cast absentee ballots by mail or need assistance in voting.

**7. Joe Potts, on behalf of Plaintiffs REVUP-Texas and The Arc of Texas.**

Mr. Potts may be contacted through counsel for OCA-GH Plaintiffs at Disability Rights Texas, 2222 West Braker Lane, Austin, Texas 78758 and HAUL Plaintiffs at 1825 K Street, NW, Suite 1200 Washington, DC 20006. Mr. Potts is a member of REVUP-Texas and The Arc of Texas and will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who seek to cast absentee ballots by mail or need assistance in voting.

**8. Teri Saltzman, on behalf of Plaintiffs REVUP-Texas and The Arc of Texas.**

Ms. Saltzman may be contacted through counsel for OCA-GH Plaintiffs at Disability Rights Texas, 2222 West Braker Lane, Austin, Texas 78758 and HAUL Plaintiffs at 1825 K Street, NW, Suite 1200 Washington, DC 20006. Ms. Saltzman is a member of REVUP-Texas and The

Arc of Texas and will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who seek to cast absentee ballots by mail or need assistance in voting.

**B. A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment (Fed. R. Civ. P. 26(a)(1)(A)(ii))**

Plaintiffs make no supplements to the First Amended Initial Disclosures with respect to the documents in their possession, custody, or control.

**C. A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered (Fed. R. Civ. P. 26(a)(1)(A)(iii))**

Plaintiffs do not seek damages in this action; however, Plaintiffs intend to seek recovery of attorneys' fees and costs incurred in this litigation.

Dated April 26, 2022.

Respectfully submitted,

/s/ Zachary Dolling

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### **CERTIFICATE OF SERVICE**

I hereby certify that on April 26, 2022, the foregoing document was served via e-mail to all counsel of record.

/s/ Zachary Dolling  
Zachary Dolling